



Representing Management Exclusively in Workplace Law and Related Litigation

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MY DIRECT DIAL: (904) 638-2663
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September 22, 2014

First Class Mail

U.S. Environmental Protection Agency
Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

PUBLIC RECORDS REQUEST

Re: Tyrone T. Taylor v. Eastern Shipbuilding Group
Case No.: 2014-CA-00613

Dear Sir/Madam:

Please note that we represent Defendant Eastern Shipbuilding Group in the pending civil action referenced above. Plaintiff Tyrone Taylor alleges that he filed a complaint regarding Eastern Shipbuilding Group. Therefore, we would like to request a copy of any file that was created as a result of Mr. Taylor's complaint.

Pursuant to § 119.07, *Florida Statutes*, Defendant requests that it be furnished with:

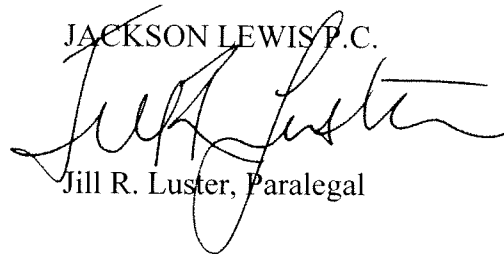
- Copies of any and all documents which were submitted to the U.S. E.P.A. by the Complainant regarding the E.P.A.'s investigation of the aforementioned allegations;
- Copies of any and all documents generated during the course of an investigation, including but not limited to, all statements, affidavits, correspondence, notes, reports, memoranda, intake notes, phone logs, telephone messages, tapes and transcripts of witness interviews;
- Copies of any other documents in the E.P.A.'s investigative file generated by any source other than the Complainant; and
- A list of those documents which the E.P.A. might decide it will not provide to Eastern Shipbuilding Group.

The undersigned will be responsible for all copying costs. Please submit an invoice for copying costs along with the requested documents.

Should you have any questions regarding this request, please feel free to contact me at (904) 638-2663. Thank you for your prompt attention to this matter.

Very truly yours,

JACKSON LEWIS P.C.

A handwritten signature in black ink, appearing to read "Jill R. Luster", is written over the typed name.

Jill R. Luster, Paralegal

Enclosure